

**HAYES | WAKAYAMA**  
5798 S Durango Drive, Suite 105  
Las Vegas, Nevada 89113  
TEL: (702) 656-0808 | FAX: (702) 655-1047

**HAYES | WAKAYAMA**  
LIANE K. WAKAYAMA, ESQ.  
Nevada Bar No. 11313  
DALE A. HAYES, JR., ESQ.  
Nevada Bar No. 9056  
JEREMY D. HOLMES, ESQ.  
Nevada Bar No. 14379  
5798 S Durango Drive, Suite 105  
Las Vegas, Nevada 89113  
(702) 656-0808 – Telephone  
(702) 655-1047 – Facsimile  
lkw@hwlawNV.com  
dhayes@hwlawNV.com  
jholmes@hwlawNV.com  
*Attorneys for Plaintiff*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

MICHAEL J. MONA, JR., an individual,  
  
Plaintiff,

vs.

MICHAEL SIFEN, an individual  
  
Defendants.

Case Number:  
2:22-cv-00821-CDS-VCF

**STIPULATION AND ORDER TO  
REQUEST FOR EXTENSION OF TIME  
TO FILE OPPOSITION**  
**(FIRST REQUEST)**

Plaintiff Michael J. Mona, Jr. (“Mona”), by and through his counsel of record, Liane K. Wakayama, Esq., Dale A. Hayes, Jr., Esq., and Jeremy D. Holmes, Esq., of the law firm of Hayes Wakayama and Defendant Michael Sifen (“Sifen”), by and through his counsel of record, Matthew T. Dushoff, Esq., and William A. Gonzales, Esq., of the law firm of Saltzman Mugan Dushoff hereby stipulate as follows:

1. On May 24, 2022, Mona filed his Complaint;
2. On July 19, 2022, Sifen filed his Motion to Dismiss Plaintiff’s Complaint (“Motion to Dismiss”);
3. Mona’s response to Sifen’s Motion to Dismiss is currently due on Tuesday, July 26, 2022;

4. Mona's counsel handling this case is currently experiencing serious health complications and has needed to be hospitalized, leaving Mona unable to meet the originally set briefing deadlines.

5. Sifen has agreed to give Mona up through and including August 16, 2022 in which to file a response to Sifen's Motion to Dismiss Complaint.

6. There are no other deadlines that are affected by this stipulation and proposed order that are presently known to the parties; and

7. This is the first stipulation and is not entered for any improper purpose or to delay.

8. Therefore, the Parties hereby stipulate and agree that Mona has up through and including August 16, 2022 in which to respond to Sifen's Motion to Dismiss.

Dated this 21st day of July, 2022

Dated this 21st day of July, 2022

**HAYES | WAKAYAMA**

**SALTZMAN MUGAN DUSHOFF**

By: /s/ Jeremy D. Holmes, Esq.

By: /s/ Matthew T. Dushoff, Esq.

LIANE K. WAKAYAMA, ESQ.

MATTHEW T. DUSHOFF, ESQ.

Nevada Bar No. 11313

Nevada Bar No. 004975

DALE A. HAYES, JR., ESQ.

WILLIAM A. GONZALES, ESQ.

Nevada Bar No. 9056

Nevada Bar No. 015230

JEREMY D. HOLMES, ESQ.

SALTZMAN MUGAN DUSHOFF

Nevada Bar No. 14379

1835 Village Center Circle

5798 S Durango Drive, Suite 105

Las Vegas, Nevada 89134

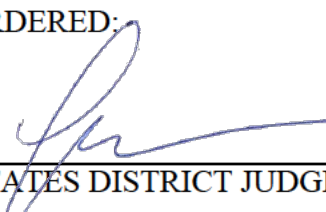
Las Vegas, Nevada 89113

*Attorneys for Defendant*

*Attorneys for Plaintiff*

**ORDER**

IT IS SO ORDERED:

  
UNITED STATES DISTRICT JUDGE

DATED: July 22, 2022